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**BELLSOUTH**

**W. W. (Whit) Jordan**  
Executive Director-Federal Regulatory

October 18, 1995

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**EX PARTE**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. Room 222  
Washington, D.C. 20554

RECEIVED

OCT 18 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**RE: CC Docket No. 95-72 (Public Version)**

Dear Mr. Caton:

The attached letter was delivered today to Kathleen Wallman, Chief of the Common Carrier Bureau, and Jim Schlichting, Chief of the Common Carrier Bureau's Policy and Program Planning Division, by the undersigned in connection with the above referenced proceeding.

Please call me if you have any questions.

Sincerely,



W.W. (Whit) Jordan  
Executive Director - Federal Regulatory

Attachment

cc; Kathleen Wallman  
Jim Schlichting

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**W. W. (Whit) Jordan**  
Executive Director-Federal Regulatory

Suite 900  
1133 21st Street, N.W.  
Washington, D.C. 20036  
202 463-4114  
Fax: 202 463-4198

October 18, 1995

Ms. Kathleen Wallman  
Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, Room 500  
Washington, D.C. 20554

**Re: CC Docket No. 95-72, FCC 95-212 (Public Version)**

Dear Ms. Wallman:

Attached is the Public Version of BellSouth's response to your letters to me dated September 29 and October 11, 1995 which requested additional data on access line costs to aid your decision-making in the above referenced proceeding.

Please call me if you have any questions.

Sincerely,



W.W. (Whit) Jordan  
Executive Director - Federal Regulatory

Attachment

cc: Chief, Policy and Program Planning Division - Common Carrier Bureau

**BellSouth Response To  
Common Carrier Bureau Data Request In NPRM  
on End User Common Line Charges (CC Docket No. 95-72)**

**ITEM (1)**

Switched Loop Services	Voice Grade Equivalent Channels	Customer Provided Digital or Analog Signal	Waivers/Interpretations on CPE	USOA Account	Separations Category
<b>(a) Single Loop Services</b>	<b>1</b>	<b>Analog (except for Sw. Digital 56 Kbps line)</b>	<b>None</b>		
Loop-2 wire				2411 - Poles 2421 - Aerial Cable 2422 - Underground Cable 2423 - Buried Cable 2441 - Conduit Systems 2426 - Intrabuilding Network Cable 2232 - Circuit Equipment	C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 COE - Cat. 4.13 COE - Cat. 4.13
Drop				2421 - Aerial Cable 2423 - Buried Cable	C&WF - Cat. 1.3 C&WF - Cat. 1.3
Main Distributing Frame				2212 - Digital Electronic Switching	COE - Cat. 3
Line Side Switch Connection				2212 - Digital Electronic Switching	COE - Cat. 3
<b>(b) ISDN Basic Rate</b>	<b>2</b>	<b>Digital</b>	<b>None</b>		
Loop-2 wire				2411 - Poles 2421 - Aerial Cable 2422 - Underground Cable 2423 - Buried Cable 2441 - Conduit Systems 2426 - Intrabuilding Network Cable 2232 - Circuit Equipment	C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 COE - Cat. 4.13 COE - Cat. 4.13
Drop				2421 - Aerial Cable 2423 - Buried Cable	C&WF - Cat. 1.3 C&WF - Cat. 1.3
Main Distributing Frame				2212 - Digital Electronic Switching	COE - Cat. 3
ISDN Line Card				2212 - Digital Electronic Switching	COE - Cat. 3
Integrated Services Switch Connection (ISLU)				2212 - Digital Electronic Switching	COE - Cat. 3

**BellSouth Response To  
Common Carrier Bureau Data Request In NPRM  
on End User Common Line Charges (CC Docket No. 95-72)**

## ITEM (1) (CONTINUED)

Switched Loop Services	Voice Grade Equivalent Channels	Customer Provided Digital or Analog Signal	Waivers/Interpretations on CPE	USOA Account	Separations Category
<b>(c) ISDN Primary Rate</b>	23	Digital	None		
T-1 Loop				2411 - Poles 2421 - Aerial Cable 2422 - Underground Cable 2423 - Buried Cable 2441 - Conduit Systems 2426 - Intrabuilding Network Cable 2232 - Circuit Equipment	C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 COE - Cat. 4.13 COE - Cat. 4.13
Digital Connection Panel (DSX-1)				2232 - Circuit Equipment	COE - Cat. 4.13
High Frequency Distribution Frame				2212 - Digital Electronic Switching	COE - Cat. 3
ISDN Line Card				2212 - Digital Electronic Switching	COE - Cat. 3
Digital Facility Switch Connection (DLTU)				2212 - Digital Electronic Switching	COE - Cat. 3
<b>(d) Megalink Channel Service (T-1 based)</b>	24	Digital	None		
T-1 Loop				2411 - Poles 2421 - Aerial Cable 2422 - Underground Cable 2423 - Buried Cable 2441 - Conduit Systems 2426 - Intrabuilding Network Cable 2232 - Circuit Equipment	C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 C&WF - Cat. 1.3 COE - Cat. 4.13 COE - Cat. 4.13
Digital Connection Panel (DSX-1)				2232 - Circuit Equipment	COE - Cat. 4.13
D4 Multiplexer				2232 - Circuit Equipment	COE - Cat. 4.13
Main Distributing Frame				2212 - Digital Electronic Switching	COE - Cat. 3
Line Side Switch Connection				2212 - Digital Electronic Switching	COE - Cat. 3

Note: Account 2111 - Land and 2121 - Buildings are included via loadings on the COE accounts 2232 and 2212.

(Item 2) Interstate Common Line Base Factor Portion (BFP)  
Annual Cost - Projected for Period 7/94 - 6/95 \*

BellSouth Total = \$1,665,009,000

- \* BellSouth does not maintain data for each non-traffic-sensitive (NTS) cost component for each service. The above amount is an available approximation of the booked annual cost data for the Common Line category. Common Line is the single access element where NTS loop costs are assigned. These Common Line costs are recovered through End Used Common Line (EUCL) and Carrier Common Line (CCL) charges. These data are from BellSouth's 1994 Annual Filing, Workpaper CLPC-B, Line 5, summed for all BellSouth states.

(Item 3) Monthly Unit Costs

Switched Loop Services

BellSouth  
Region  
Estimated  
Monthly  
Costs (\$)

(a) Single Loop Services

- Loop
- Central Office (C.O.) Line Termination
- Total-Loop + C.O. Line Termination

(b) ISDN Basic Rate

- Loop
- C.O. Line Termination
- Total-Loop + C.O. Line Termination

(c) ISDN Primary Rate

- Loop
- C.O. Line Termination
- Total-Loop + C.O. Line Termination

(d) Megalink Channel Service

(T-1 Based)

- Loop
- C.O. Line Termination
- Total-Loop + C.O. Line Termination

**(Item 4) Difference in NTS Costs Among Services**

The NTS loop costs reflect the electronics and outside plant facilities required to provide a physical transmission path from the central office to the customer premises. Loops for difference services have unique characteristics such as loop length, digital loop carrier plug-in requirements, and capacity. For example, the MEGALINK Channel Service loop is a 1.544 Mbps capacity circuit (24 voice grade while the single line business is a voice grade capacity circuit).

The NTS line termination (switch) costs reflect the equipment required to terminate a line for a particular application. Different applications may require a unique type of line card. The cost differences arise due to material prices and capacities of the equipment.